

SANDERS LAW, PLLC

ATTORNEYS AT LAW

100 GARDEN CITY PLAZA

SUITE 500

GARDEN CITY, NEW YORK 11530

TEL: (516) 203-7600

FAX: (516) 706-5055

Robert J. Baker
David M. Barshay
Marc D. Grossman[†]
Craig B. Sanders[°]
Douglas H. Sanders[°]

Mark R. Bernstein
Martin Block
Edward A. Cespedes
Jennifer M. Gerdes
Michael C. Hayes
Melissa C. Ingrassia
Randi A. Kassan

[◊] Admitted in NY, FL, CA, UT*, MD, CO

[◊] Admitted in NY, MI, GA, KY, MA*, OH*, AZ*

^Δ Admitted in NY, MA, WA

[†] Admitted in NY, NJ, PA, IL*

[‡] Admitted in NY, NJ, PA, CT, DC*

[°] Admitted in NY, MA

* Pending admission

Val Kleyman
Joaquin J. Lopez
Barbara Manes
Glenn Miller^Δ
Todd D. Muhlstock
Steven J. Neuwirth
Edward J. Nitkewicz
Karishma Patel[†]
Poly Papadopoulos
Melissa A. Pirillo[‡]
Malgorzata Rafalko
Angelo F. Rizzo
Phyllis L. Sanders
Stanley J. Sanders
Cindy S. Simms
Joseph B. Viener
Meryl S. Viener
Michael F. Vileck
Edward D. Woycik, Jr.

May 18, 2015

VIA ECF

Judge Leonard D. Wexler
Senior United States District Court Judge
944 Federal Plaza
Central Islip, New York 11722

Re: *Beltrez v. Credit Collection Services, Inc.*
Case Number: 2:14-cv-07303-LDW-AKT

Dear Judge Wexler:

This office is counsel to the Plaintiff in the above-referenced matter. Pursuant to Your Honor's *Individual Motion Practice and Rules*, Rule 2B, kindly allow this correspondence as Plaintiff's response to Defendant's request for a pre-motion conference. (Dkt. 24)

While Plaintiff vehemently disagrees with Defendant's arguments as to why Defendant believes it is entitled to dismissal, and while Plaintiff strongly believes that the applicable case law holds heavily against dismissal of this action, Plaintiff has no objection to Defendant's making of such motion. In its opposition to the motion, Plaintiff intends to fully make its arguments as to why dismissal is inappropriate in this case.

As such, should this Honorable Court determine to waive the requested pre-motion conference, it is respectfully requested that the Court issue an Order requiring the parties to submit a briefing schedule concerning the motion. To the extent that the Court determines to hold a pre-motion conference, the undersigned will attend.

Thank you for your attention herein.

Respectfully submitted:

/s/ David M. Barshay
David M. Barshay (DB1790)
Sanders Law, PLLC
100 Garden City Plaza
Suite 500
Garden City, New York 11530
516-203-7600

Cc: All parties via ECF